



U.S. Department of Justice

*United States Attorney
Southern District of New York*

Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

July 23, 2025

BY CM/ECF

The Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *United States v. Keonne Rodriguez and William Lonergan Hill,*
S3 24 Cr. 82 (DLC)**

Dear Judge Cote:

As requested by the Court during the conference on July 22, 2025, the Government writes to provide a report regarding the exclusions of time under the Speedy Trial Act in this case. As further described below, it appears that all time since April 29, 2024 has been excluded under the Speedy Trial Act under 18 U.S.C. § 3161(h)(7)(A), except for the period between September 10, 2024 and September 17, 2024. During that seven-day period, there were two pending pretrial motions relating to bail, which covered September 10-11, 2024 and September 16-17, 2024. *See* 18 U.S.C. § 3161(h)(1)(D) (excluding delays resulting from the filing of motions through prompt disposition of such motions). As a result, the Government currently estimates that approximately four days have been deducted from the Speedy Trial Act clock in this case:

- On April 29, 2024, Defendant Keonne Rodriguez had his first appearance in the Southern District of New York and was arraigned on the S2 24 Cr. 82 Indictment,¹ and time was excluded under the Speedy Trial Act until May 14, 2024. (Docket No. 8).
- On May 13, 2024, time under the Speedy Trial Act was excluded until May 28, 2024. (Docket No. 20).
- On May 28, 2024, time under the Speedy Trial Act was excluded until September 4, 2024. (Docket No. 21).
- On July 10, 2024, time under the Speedy Trial Act was excluded until September 10, 2024. (Docket No. 39).
- On September 10, 2024, Rodriguez filed a motion requesting to travel to the court conference scheduled for September 17, 2024, which was granted on September 11, 2024. (Docket Nos. 51, 52).

¹ The 24 Cr. 82 Indictment and S1 24 Cr. 82 Indictment currently remain under seal.

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- On September 16, 2024, Rodriguez filed a motion to modify the conditions of his pretrial release, which the Government opposed in writing on September 17, 2024 and was denied on September 17, 2024. (Docket Nos. 53-56).
- On September 17, 2024, time under the Speedy Trial Act was excluded until December 17, 2024. (Docket No. 56).
- On December 11, 2024, time under the Speedy Trial Act was excluded until March 12, 2025. (Docket No. 64).
- On January 21, 2025, time under the Speedy Trial Act was excluded until March 18, 2025. (Docket No. 68).
- On March 18, 2025, time under the Speedy Trial Act was excluded until July 16, 2025. (Docket No. 77).²
- On July 14, 2025, time under the Speedy Trial Act was excluded until July 22, 2025. (Docket No. 125).
- On July 22, 2025, time under the Speedy Trial Act was excluded until November 3, 2025.

Respectfully submitted,

NICOLAS ROOS

Acting Deputy United States Attorney, Attorney
for the United States,
Acting Under Authority Conferred by
28 U.S.C. § 515

By: /s/

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² Time under the Speedy Trial Act was also excluded between June 24, 2025—the date of the filing of the S3 24 Cr. 82 Superseding Indictment—and the arraignment of the defendants on this superseding indictment on July 22, 2025. The Second Circuit has previously held that the time between the filing of a superseding indictment and the arraignment on the superseding indictment is excluded under the Speedy Trial Act. *United States v. Kelly*, 45 F.3d 45, 48 (2d Cir. 1995) (analogizing superseding indictment to situation where original indictment is dismissed and clock resumes after defendant’s first judicial appearance on the second indictment); *see also United States v. Lopez Castro*, 2024 WL 3983339, at *10 (S.D.N.Y. Aug. 29, 2024) (“[T]he filing of a superseding tolls the speedy trial clock until the defendant’s first judicial appearance on the superseding indictment.” (internal citation omitted)).